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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

This Document Relates to:  
  
ALL ACTIONS

Case No. 3:23-md-03084-CRB

**DEFENDANT UBER TECHNOLOGIES,  
INC., RAISER-CA, LLC, AND RAISER,  
LLC'S BRIEF IN SUPPORT OF UBER'S  
PRIVILEGE CLAIMS CHALLENGED BY  
PLAINTIFFS FOR THE RYAN GRAVES  
CUSTODIAL FILE – PURSUANT TO  
SPECIAL MASTER ORDER NO. 3 (DKT.  
2472)**

Pursuant to Special Master Order No. 3, I (4) (Dkt. 2472), Defendants submit this brief in support of their position on the remaining privilege challenges for custodian Ryan Graves. On March 18, 2025, Plaintiffs challenged approximately 32 documents within this custodial file. Through conferrals, the parties have narrowed their dispute to 11 challenges. These challenges are now submitted for the Special Master's review.

Defendants incorporate by reference the legal standard and arguments set forth in their prior briefing (Dkts. 2433, 2461, 2528, 2544, and 2580). As explained more fully in the prior briefs, the applicable legal standard and the factual material previously provided to the Special Master,<sup>1</sup> when reviewed in conjunction with the challenged documents and the associated metadata fields, support Uber's privilege and work product assertions. The remaining privilege claims submitted for the Special Master's determination should be upheld.

DATED: March 31, 2025

Respectfully submitted,

**SHOOK HARDY & BACON L.L.P.**

By: /s/ Maria Salcedo

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<sup>1</sup> As requested by the Special Master, Uber has provided (1) a glossary of terms commonly used in disputed documents, (2) a list of names and titles of relevant Uber inside and outside counsel, and (3) a digest of third-parties present in its privilege log. Defense counsel will also be available for any questions the Special Master may have during the review process.

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**CERTIFICATE OF SERVICE**

I hereby certify that on March 31, 2025, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will automatically send notification of the filing to all counsel of record.

/s/ Maria Salcedo  
MARIA SALCEDO